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*Attorneys for Defendants
Irico GROUP CORP. and
Irico DISPLAY DEVICES CO., LTD.*

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION,) Case No. 3:07-cv-05944-JST
THIS DOCUMENT RELATES TO:) MDL No.: 1917
ALL DIRECT PURCHASER ACTIONS)
) **DECLARATION OF STUART C.
PLUNKETT IN SUPPORT OF IRICO
DEFENDANTS' OBJECTIONS TO
SPECIAL MASTER'S ORDER OF
SEPTEMBER 28, 2018**
) Honorable Jon S. Tigar
)
)
)

1 I, Stuart C. Plunkett declare as follows:

2 1. I am an attorney admitted to practice law in this Court and in the State of
 3 California. I am a partner with the law firm of Baker Botts L.L.P., which represents Defendants
 4 Irico Group Corporation (“Irico Group”) and Irico Display Devices Co., Ltd. (“Irico Display”)
 5 (collectively, “Irico Defendants”). I make this Declaration based on my personal knowledge and
 6 in support of the Irico Defendants’ Objections to Special Master’s Order of September 28, 2018.

7 2. As Irico has disclosed to Plaintiffs during meet and confer communications and in
 8 discovery responses, Irico maintains archives of hardcopy documents. In response to both DPPs’
 9 and IPPs’ requests for documents and information during jurisdictional discovery in this matter,
 10 Irico has identified these archives as containing responsive documents. The responsive
 11 information available in the archives includes accounting and sales records responsive to
 12 requests for sales information and financial, operational, and administrative records responsive
 13 to requests for all documents related to the Chinese government’s ownership and supervision of
 14 Irico. Irico notified Plaintiffs that its archives were available for inspection in discovery
 15 responses served May 4, 2018.

16 3. At Plaintiffs’ request, Irico provided a detailed description of the archived
 17 documents, including document types, quantities, and locations.

18 4. On October 2, 2018, we obtained an estimate for reviewing and summarizing
 19 information from Irico’s archived sales records. We obtained the estimate from a vendor that
 20 specializes in the collection of hardcopy files from companies in China. The vendor provided an
 21 estimate for reviewing and extracting relevant information from 880,000 pages consisting of
 22 bound and unbound documents. This is the quantity of documents Irico estimates for its archive
 23 of sales and accounting records from 1995 to 2007. The vendor estimates that the cost would be
 24 **\$750,000-\$1,250,000** and require their full team of specialists in China working full-time for
 25 approximately 2-4 months.

26 5. On September 26, 2018, the Discovery Master ordered Irico to search for and
 27 produce responsive documents from China National Electronic Import & Export Caihong Co.
 28 (“CNEIECC”), a long-defunct state-owned company that exported some of Irico’s products until

1 2005 and was placed under Irico Group's ownership almost a decade after it ceased operations.
2 Given that the Order was issued just days ago, Irico has only been able to provide preliminary
3 estimates of the archived sales records of CNEIECC. Irico preliminary estimates that there are
4 400,000 pages of such archived hardcopy documents from the relevant period, mostly bound.
5 Extrapolating from the per-page cost of \$0.85-\$1.42 implied in the vendor's estimate, reviewing
6 and extracting the relevant information from these documents would add **\$340,000-\$568,000** to
7 Irico's costs. The estimate also implies that analyzing these documents would add another 1-2
8 months.

9 6. This review work could not be performed in-house as Irico lacks the resources to
10 perform these tasks.

11 7. These estimates do not include the additional burden and expense associated with
12 legal review and supervision, which also would have to be outsourced by Irico.

13 I declare under penalty of perjury that the foregoing is true and correct. Executed this 3rd
14 day of October 2018 in the District of Columbia.
15

16 /s/ Stuart C. Plunkett

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